STATE OF CALIFORNIA

BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY DEPARTMENT OF BUSINESS OVERSIGHT

TO: Deadra Joiyon Williams
I-Strategy, LLC
I-Health and Wellness, LLC
1521 Hobson Avenue
West Sacramento, California 95605

DESIST AND REFRAIN ORDER

(For violations of sections 25110 and 25230 of the Corporations Code)

The Commissioner of Business Oversight (Commissioner) finds that:

- 1. I-Strategy, LLC was formed on October 1, 2015, as a limited liability company in California.
- 2. I-Health and Wellness, LLC was formed on December 2, 2016, as a limited liability company in California.
- 3. The current address of I-Strategy, LLC and I-Health and Wellness, LLC is 1521 Hobson Avenue, West Sacramento, California 95605.
- 4. Deadra Joiyon Williams (Williams) is the managing member of I-Strategy, LLC and I-Health and Wellness, LLC.
- 5. Beginning on or about October 2015, Deadra Joiyon Williams offered or sold securities in California in the form of memberships in I-Strategy, LLC and I-Health and Wellness, LLC to at least four investors in each entity.
- 6. The Commissioner has no record of qualification or notice of exemption from qualification being filed by Williams, I-Strategy, LLC, or I-Health and Wellness, LLC for the offer or sale of these memberships.
- 7. Williams and I-Strategy, LLC received investment funds from members. As the managing member of I-Strategy, LLC, Williams created and/or directed investment of these funds into securities, thereby providing investment advice to these members.

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| 2 | including entrance fees, placement fees, and fees for investment administration and management. |
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| 3 | 9. The Commissioner has not issued an investment adviser certificate to Williams or I-Strategy, |
| 4 | LLC. |
| 5 | Based on the foregoing findings, the Commissioner of Business Oversight is of the opinion |
| 6 | that the memberships in I-Strategy, LLC and I-Health and Wellness, LLC are securities subject to |
| 7 | qualification under the Corporate Securities Law of 1968, and have been offered or sold without first |
| 8 | being qualified or exempt from qualification in violation of Corporations Code section 25110. |
| 9 | Pursuant to Corporations Code section 25532, Deadra Joiyon Williams, I-Strategy, LLC, and I- |
| 10 | Health and Wellness, LLC are hereby ordered to desist and refrain from the further offer or sale of |
| 11 | securities in California, unless and until qualification has been made or unless exempt. |
| 12 | In addition, the Commissioner of Business Oversight is of the opinion that Deadra Joiyon |
| 13 | Williams and I-Strategy, LLC have conducted business as investment advisers in this state for |
| 14 | compensation by advising members to invest in various securities without first having applied for and |
| 15 | secured from the Commissioner a certificate authorizing them to act in that capacity, in violation of |
| 16 | Corporations Code section 25230. Pursuant to Corporations Code section 25532, Deadra Joiyon |
| 17 | Williams and I-Strategy, LLC are further ordered to desist and refrain from conducting business as an |
| 18 | investment adviser in this state unless and until they have applied for and secured from the |
| 19 | Commissioner a certificate, then in effect, authorizing them to act in that capacity. |
| 20 | This Order is necessary, in the public interest, for the protection of investors and consistent |
| 21 | with the purposes, policies, and provisions of the Corporate Securities Law of 1968. |
| 22 | Dated: April 20, 2018 |
| 23 | Sacramento, California JAN LYNN OWEN |
| 24 | Commissioner of Business Oversight |
| 25 | By |
| 26 | MARY ANN SMITH Deputy Commissioner |
| 27 | Enforcement |
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As compensation, Williams received various fees from members of I-Strategy, LLC,